

The FAA should add

61.39(a) Except as provided in paragraphs (b) and (c) and (f) of this section...

61.39(f) A person who has a Ground Instructor certificate with privileges to give instruction for the rating for which that person is applying, may present this certificate instead of complying with paragraphs (a) (1), (a) (2), and (a) (6) (iii) of this section.